Exhibit 3

BUTLER | SNOW

March 4, 2013

VIA E-MAIL
Bryan Aylstock, Esq.
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RE: *In re: Ethicon, Inc. Pelvic Repair System, Products Liability Litigation*, MDL No. 2327

Dear Bryan:

I am writing concerning several issues raised by the amended 30(b)(6) regulatory affairs deposition notice that was served last week on February 20, 2013. The new notice, particularly the document requests, again raises the ex-US document issues that have been the subject of our meet and confers.

I want to recap where we are with respect to the ex-US document issue. As we have previously discussed, we have agreed to collect and produce regulatory documents from France, Australia and, pursuant to your most recent request, Japan. As we have told you previously, ex-US regulatory documents are not stored in a central place. Instead, they are generally kept in the country of origin. Accordingly, just coordinating the identification and collection of documents from these three countries has taken a tremendous amount of work and time.

We have made significant progress and are moving forward with the collection of these documents. Barring a volume of documents that is higher than we expect, or documents that take a significant amount of translation, we should have these documents produced to you within the next thirty to forty-five days on a rolling basis. If we see that schedule is not going to work, we will let you know.

We have already produced to you: (a) all world wide adverse events; and (b) the TVT regulatory documents related to the US and EU that are stored at Somerville, New Jersey. We also plan to produce in connection with the Regulatory Affairs 30(b)(6) deposition several charts that identify the regulatory contacts in ex-US jurisdictions as well as the regulated status of the various TVT products in the ex-US jurisdictions.

In order to facilitate discussions concerning what additional ex-US materials will be produced, you proposed a 30(b)(6) deposition so that you could understand how and where these documents are maintained, and what the burden would be on Ethicon to identify, collect and produce these documents. We have generally discussed with you that this deposition will focus on regulatory, professional education and marketing documents.

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As you know, we have set a March 18, 2013 date for this deposition. However, despite several requests, we did not receive a 30(b)(6) notice from you setting forth the topics to be covered until March 2, 2013. Although we are still going trough the extensive 19 page notice that contains 41 primary topics and 51 additional subtopics, the notice is far more extensive than what we previously discussed to help you understand the storage of ex-US documents.

While we have been working for a while now to prepare our witness on the general topics, we will clearly need additional time to adequately prepare our witness(es) based on the breadth of the recently received notice. Accordingly, please let me know your availability to schedule the deposition for the week of April 8.

Turning to the regulatory 30(b)(6) notice, you seek testimony and documents not just on US regulatory issues, but for regulatory issues worldwide. For example, and without limitation, topic 3 seeks testimony concerning compliance with "all foreign medical device regulations applicable to your TVT products . . ." Document request 14 seeks documents concerning approval processes for all countries other than the US.

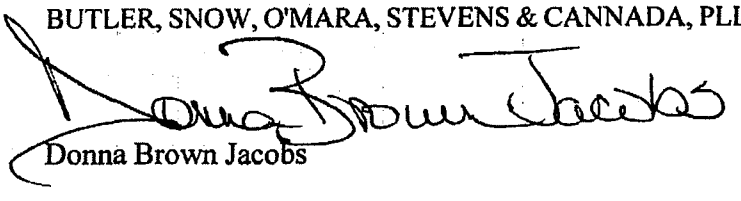
You either have received or will receive this afternoon a more specific list of topics from the notice that Susan Lin will cover. She will be prepared to testify concerning regulatory approval processes in the US and the EU. This will give you a significant amount of information on the top markets in which TVT products are sold, including France. You already have the key EU regulatory documents such as the CE Mark technical files or Design Dossiers for all seven products. Ms. Lin will be prepared to respond to questions concerning the EU process in general, and she will also be prepared to specifically respond to questions concerning the EU process and the result for all seven TVT products.

Australia is a reciprocal country that accepts the product as a result of the fact that it is CE approved and manufactured in Europe. Ms. Lin will be able to testify about this process as well. Since you have expressed interest in Japan and Australia specifically, we expect a follow on deposition that focuses on those countries will be necessary once the documents for those countries have been produced.

In line with what I have set forth above, let's plan to have a call to see if we can come to an agreement on these issues.

Very truly yours,

BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC



Donna Brown Jacobs

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